

201-14925



December 17, 2003

Via e-mail and U.S. mail

Mr. Michael Leavitt
Administrator
U.S. Environmental Protection Agency (EPA)
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-to-Know Program

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RE: U.S. High Production Volume Chemical Program - Assessment of Data Availability and Test Plan Report and Robust Summary Document for the Pyridine and Pyridine Derivatives Category-HPV Consortium No.

Dear Mr. Leavitt:

The American Chemistry Council's Pyridine and Pyridine Derivatives (PPD) High Production Volume (HPV) Work Group (Work Group¹) is submitting for review and comment its assessment of data availability and test plan report and robust summary document for the PPD Category. These documents are submitted for U.S. HPV Challenge program.

As indicated in the Work Group's July 31, 2003 letter to EPA, the Work Group has transferred its HPV commitment from the International Council of Chemical Associations (ICCA) HPV Initiative to the U.S. HPV Challenge program. Having taken into consideration EPA's comments on the Work Group's ICCA test plan and robust summary document, the Work Group has made significant revisions to these documents, which are reflected in the current submission. The Work Group is not providing its original ICCA test plan or EPA's comments on this plan at this time in order to avoid confusion. However, copies will be made available to interested parties upon request.

This submission consists of an enclosed hard copy and compact disc, which contains electronic copies of the documents. Also, the documents have been submitted to EPA electronically via e-mail.

¹ The Work Group currently consists of the following companies: Koei Chemical Co., Ltd.; Nalco; Nepera; and Reilly Industries, Inc.

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The Work Group understands that there will be a review 120-day period for the assessment of data availability and test plan report and robust summary document, and that all comments generated by EPA will be forwarded to the Work Group for consideration.

On the basis of the data in the attached report, the Work Group has concluded that the chemicals in the PPD Category are structurally similar and that these similarities result in similar or predictable patterns in physicochemical, environmental and toxicological properties. In accordance with the principles outlined in the EPA's October 14, 1999, "Letter to Manufacturers/Importers," the Work Group carefully has developed a test plan for the Category that minimizes excessive use of animal testing while providing adequate scientific data to meet HPV data requirements. This approach is consistent with EPA's guidance on the development and use of chemical categories in the HPV Challenge Program.

Thank you in advance for your attention to this matter. The Work Group looks forward to your comments on this submission. If you have any questions regarding the submission documents, please contact Laurie Miller, the Work Group manager. Ms. Miller can be reached at 703-741-5611 (telephone), 703-741-6091 (telefax) or <laurie_miller@americanchemistry.com> (email).

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Enclosures

cc: Charles Auer (EPA)
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